

## **REMARKS**

Claims 1-5, 8, 10-16 and 19-28 are pending in the application and stand rejected.

Applicants respectfully traverse the rejections, and request reconsideration based on the following remarks.

### **Claim Rejections- 35 U.S.C. § 102**

Claims 1, 2, 15, 16, 22 and 24 stand rejected as being anticipated by U.S. Patent No. 6,374,210 to Chu. At the very least, Chu is legally deficient to establish a prima facie case of anticipation against claims 1, 15 and 16.

To begin, there are fundamental distinctions between Chu and the claimed invention regarding function and purpose. Chu is directed to a method for segmenting or otherwise separating words in an input text string comprising connected text. Chu discloses an automated method for identifying boundaries between words for languages (e.g., Asian languages) in which words are not clearly separated or otherwise delineated by boundary maskers, such as a space or punctuation marks, etc., as in western languages (see, e.g., Col. 1, lines 15-40.)

On the other hand, the claimed inventions (e.g., claims 1, 15 and 16) are directed to methods and systems for managing textual archives using semantic units of words. Textual data is transcribed into corresponding semantic units of words, and then stored in a textual database. An index is then generated based on semantic units of words to thereby index the stored textual data with the corresponding semantic units. On a fundamental level, there is nothing in Chu regarding the management of a textual archive wherein stored textual data is indexed to corresponding semantic units. As such, the Examiner's reliance on Chu is unclear and appears to be misplaced.

In any event, Chu clearly does not teach or suggest various features of claims 1, 15 and 16. For instance, Chu does not disclose or suggest a process of *identifying a data type of the textual data and then transcribing the textual data into corresponding semantic units of words using a recognition system for the identified data type*, as essentially claimed in claims 1, 15 and 16. Examiner cites Col. 5, lines 24-26 and 30-33 of Chu as disclosing the above claimed features. However, Examiner's reliance on Chu in this regard is unclear and seemingly misplaced. Chu merely teaches an identification means (120) for segmenting the input text string into one or more word sequences. This is in stark contrast to, and is fundamentally distinct from, the claimed process of identifying a data type (e.g., handwriting text, typed text, etc.) and then applying the appropriate transcribing application to transcribe the identified text data. There is nothing in Chu that discloses the claimed feature of identifying the data type of the input string.

Furthermore, Chu does not disclose or suggest *generating an index based on semantic units of words, wherein the textual data stored in the textual database is indexed with the corresponding semantic units*, as essentially claimed in claims 1, 15 and 16. Examiner cites Col. 5, lines 38-42 and Col. 6, lines 26-30 as disclosing the claimed features. However, Examiner's reliance on Chu in this regard is unclear and seemingly misplaced. Chu merely teaches in the cited sections a word model/lexicon which is used to decode and segment the input text into words. There is simply nothing in Chu that teaches decoding the input text into semantic units and then storing the input text in an textual archive/database where the stored input text is indexed to its corresponding semantic units.

Accordingly, for at least the above reasons, claims 1, 15 and 16 are clearly


patentable distinct and patentable over Chu. Moreover, claims 2, 22 and 24 are patentably distinct and patentable over Chu at least by virtue of their dependence from respective base claim 1.

**Claim Rejections- 35 U.S.C. § 103**

The remaining dependent claims are rejected as being obvious in view of Chu in combination with one or more of a myriad of other cited references, as set forth on pages 5-11 of the Office Action. In particular, each of the cited obviousness rejections are premised, in part, on Chu's purported teachings as applied to base claims 1, 15 and 16. However, without further elaboration required, each of the obviousness rejections are legally deficient on their face for at least the same reasons given above for claims 1, 15 and 16 in that Chu fails to disclose or suggest the claimed features of claims 1, 15 and 16.

Accordingly, no *prima facie* case of obviousness has been established based on Examiner's reliance of Chu. Therefore, withdrawal of the above obviousness rejections is requested.

Respectfully submitted,



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